

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ARTHUR USHERSON,

Plaintiff,

v.

BANDSHELL ARTIST MANAGEMENT,

Defendant.

Docket No. 1:19-cv-6368 (JMF)

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**NOTICE OF MOTION FOR SECURITY FOR COSTS AND FEES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Mark J. McKenna dated November 26, 2019, Declaration of Brad R. Newberg dated November 26, 2019, and all exhibits annexed thereto, and upon all prior proceedings, pleadings, and filings in this action, Defendant Bandshell Artist Management, by and through their undersigned counsel, hereby moves this Court before the Honorable Jesse M. Furman, at the Thurgood Marshall United States Courthouse, Courtroom 1105, 40 Foley Square, New York, New York, 10007, for an Order requiring Plaintiff Arthur Usherson to show cause why he should not be required to post a bond to proceed with this action pursuant to Local Civil Rule 54.2

Dated: November 27, 2019

Respectfully submitted,

/s/ Brad R. Newberg  
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Artist Management*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing Notice of Motion for Security for Costs and Fees with the Clerk of the Court using the CM/ECF system on this 27<sup>th</sup> day of November, 2019, which constitutes service on Plaintiff, a registered user of the CM/ECF system pursuant to Fed. R. Civ. P. 5(b)(2)(E).

Dated: November 27, 2019

/s/ Brad R. Newberg  
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